

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

DSCF STANDARD MAIL LOAD LEVELING

Docket No. N2014-1

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MALONE TO
QUESTION 7(b) OF PRESIDING OFFICER'S INFORMATION REQUEST NO. 1**
(February 4, 2014)

The United States Postal Service hereby provides the response of witness Malone to Question 7(b) of Presiding Officer's Information Request No. 1, filed on January 24, 2014. Question 7 is stated verbatim and is followed by the response to part (b). A response to part (a) is forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Anthony F. Alverno
Chief Counsel, Global Business & Service.
Development

Michael T. Tidwell

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2998; Fax -5402

**RESPONSE OF THE UNITED STATES POSTAL SERVICE WITNESS MALONE
TO PRESIDING OFFICER'S INFORMATION REQUEST NO. 1
REDIRECTED FROM WITNESS ANDERSON**

7. In the Postal Service response to PR/USPS-T2-3, Attachment at A-1, "Political Mail" is identified in the Delta column of the Load Leveling Plus & Delta Chart.
 - a. What percentage of DSCF entered Standard Mail is time-sensitive political mail?
 - b. Please describe how the Postal Service intends to treat such mail under the proposed Load Leveling Plan?

RESPONSE

- a. [Resources have been deployed for the purpose of developing a response.]
- b. The Postal Service's treatment of "Political Mail" is summarized in the attached document. As a matter of policy, DSCF Standard "Political Mail" is subject to the same service standard as other DSCF Standard Mail and shares the same level of priority in dispatch and handling as other DSCF Standard Mail relative to products such as Priority Mail, First-Class Mail and Periodicals. Implementation of the Load Leveling Plan is not intended to change the treatment of DSCF Standard "Political Mail" or those relative relationships.

Processing Operations SOP: Political Campaign and Message Mail

Subject:	Processing Operations Policy: Political Campaign and Message Mail
Policy Tracking Number:	052012R Political Campaign and Message Mail
Effective Date:	May 9, 2014
Functional Responsibility:	Headquarters Network Operations
Development, Distribution and Updates:	Headquarters Processing Operations Linda Malone, Manager Processing Operations
Revision Date:	November 15, 2013

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General

The American electorate votes on numerous political offices and issues. Citizens cast ballots every 4 years for president, every 2 years for one-third of the U.S. senators and all members of the House of Representatives, and at varying frequencies for governorships and other state, county, and local offices and referenda measures. During the period preceding local, state, and national primaries, special elections, and general elections, the Postal Service accepts and delivers many political campaign and message mailings, frequently in large quantities. These mailings are made up by individual candidates and their campaign organizations, as well as by local, state, and national committees of political parties.

Purpose

The purpose of this Standard Operating Procedure (SOP) is to define and establish the procedure to receive, process, and deliver Political Campaign and Message Mail.

Identifying Political Campaign Mail

- Any material accepted for mailing at First-Class Mail or Standard Mail postage rates that is mailed for political campaign purposes by a registered political candidate, campaign committee, or committee of a political party is classified as a political campaign mailing. This type of mailing normally uses the address of a candidate's campaign committee or the committee of a political party as the return address. Do not confuse political campaign mailings with official mailings by members of Congress under congressional franking privileges.
- An individual or organization recognized as such by the appropriate governmental election control authority is considered to be a registered political candidate or party.
- A qualified political committee for the purpose of eligibility for Nonprofit Standard Mail rates as follows:
 - a. The term qualified political committee means:
 - A national committee of a political party.
 - A state committee of a political party.
 - The Democratic Congressional Campaign Committee.
 - The Democratic Senatorial Campaign Committee.
 - The National Republican Congressional Committee.
 - The National Republican Senatorial Committee.
 - b. The term national committee means the organization that, by virtue of the bylaws of a political party, is responsible for the day-to-day operation of that political party at the national level.
 - c. The term state committee means the organization that, by virtue of the bylaws of a political party, is responsible for the day-to-day operation of that political party at the state level.

Postage for political campaign mail can be paid by permit, postage indicia, postage meter, or stamps affixed to each mail piece. Mailing by qualified political committee often bear endorsements such as "Paid for by (committee) and authorized by (candidate)".

A qualified political committee can be eligible for nonprofit Standard Mail rates. The name and return address of the qualifying organization must appear either on the outside of the mailpiece or in a prominent location on the material being mailed at the Nonprofit Standard Mail rates.

Identifying Political Message Mail

Effective June 26, 2012, the U.S. Postal Service is expanded the use of Tag 57 to include *political message mailings* from Political Action Committees (PACs), Super-PACs, or other organizations engaged in issue advocacy or voter mobilization

The DMM will remain unchanged. Eligibility rules remain unchanged. This expanded use of Tag 57 is for operational purposes only.

Use of Tag 57

Tag 57 can be used for any political campaign mailing by a registered political candidate, campaign committee, and committee of a political party, *or a political message mailing by a Political Action Committee (PAC), Super-PAC, or other organizations engaged in issue advocacy or voter mobilization.*

Mail from organizations, such as labor unions, religious groups, retiree associations, and others that endorse specific candidates or political issues is not political campaign mail. However, this mail is considered “political message mail” and can be identified with Tag 57 for processing.

The use of Tag 57 is optional, but the Postal Service does encourage mailers to use the tag to identify trays and sacks of political campaign mail and political message mail while it’s in the mail stream.



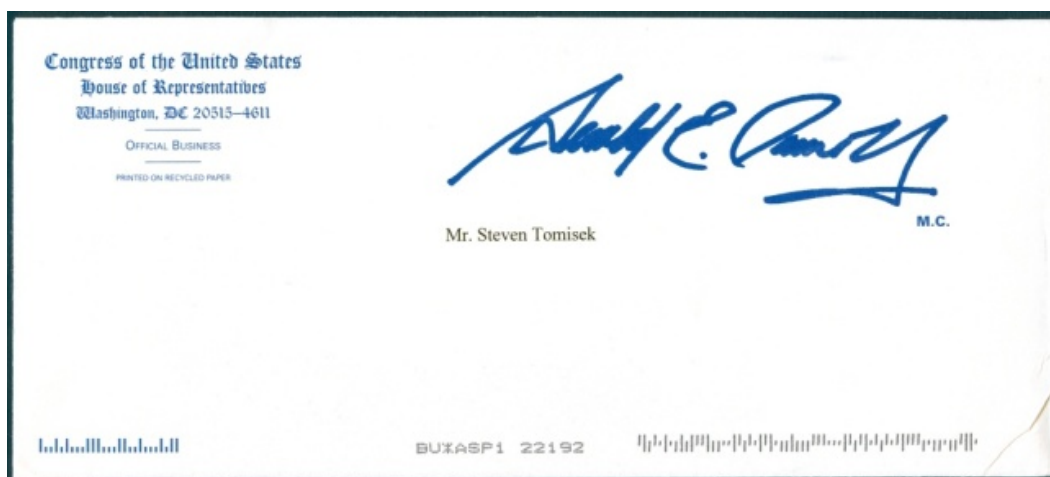
Identifying Franked Mail

Franked Mail, also referenced as Congressional Mail, is defined as official mail sent **without** postage prepayment, which can be utilized by Members and members-elect of Congress, the Vice-President, and other authorized individuals. Franked Mail is identified by the facsimile signature of the Member of Congress in the upper right corner of the envelope or franked label, followed by “M.C.” standing for Member of Congress, or “U.S.S.” for U.S. Senate.

Franked mail can be sent as single piece or mass congressional mailings. Most mass congressional mailings are sent from Washington, DC. Members of Congress may, however, dispatch these mailings from Post Offices other than Washington, DC. Members of Congress occasionally enter mass mailings at local Post Offices outside Washington, DC. Members or their vendors must submit a PS Form 3615, *Mailing Permit Application and Customer Profile*, to the entry Post Office when the first franked mass mailing is made there.

Franked Mail Envelopes – It is permissible for congressional offices to secure their franked envelope to various other envelopes or packaging, when placing items in the mailstream. If such an item is identified, do not return it to the congressional office and do not detain it unless there is a question of mail security.

Congressional mass mailings do **not** receive a PS Tag 57: *Political Campaign Mailing*, which is used to identify Political Campaign Mail. PS Tag 11, *Congressional Mail*, “Postmaster — Open and Distribute” is used on all sacks or trays of congressional mail. This tag helps identify the franked congressional mailing as it moves through the mailstream.



Example of a franked mail envelope.

Franking Blackout Period – With the exception of individual piece mailings and those in response to a request, Members of Congress who are seeking re-election are prohibited from sending franked mass mailings during the designated “Franking Blackout” period before Election Day, whether primary, special, or general election.

For Members of the House of Representatives who are seeking re-election, the Franking Blackout period is 90 days before an election. For example, for the General Election on November 4, 2014 the Franking Blackout period begins August 6, 2014 and extends through Election Day.

Processing Operations SOP: Political Campaign and Message Mail

For Member of the Senate who are seeking re-election, the Franking Blackout period is 60 days before an election. For a primary election scheduled on June 3, 2014, the Franking Blackout Period would begin April 4, 2014.

As noted above, this does **not** include individual piece franked mailings. If you receive a mass franked mailing with PS Tag 57 in your unit, please contact your supervisor or BME Manager. If there are indications of abuse, local management may escalate the issue by making a copy of the mailing and submitting a completed Issue Report to the District Election and Political Mail Coordinator.

Detention of Franked Mail – Employees should be aware that Franked Mail is **not** to be detained. In 2009, the Postal Operations Manual (POM) was revised to give specific guidelines concerning how to handle this mail in response to an incident where a franked mailing was improperly detained. It is important that these guidelines are adhered to in order to ensure there are no delays when dealing with Franked (Congressional) Mail. With the exception of mail security, Franked Mail must be dispatched and delivered as addressed. If there are indications of abuse of the franking privilege, this must be reported to the Pricing and Classification Service Center (PCSC), who will in turn refer the case to the Postal Inspection Service and Government Relations, Headquarters.

Postal Service Responsibility

The Postal Service is responsible for providing information to assist in the knowledgeable preparation and deposit of political campaign and message mailings, as well as for the proper acceptance, processing, delivery, and recording of these mailings. Our job is to ensure that each mailing is handled properly and with equal care and attention. Be alert for the red Tag 57. We must expedite any political campaign and message mailings through our operations.

Handling of Undeliverable as Addressed Mail

- If a significant amount of a Political Mailing (greater than 20% of a total mailing) is received that is undeliverable as addressed, postmasters must inform the applicable campaign office before any action to dispose of such mail. Postmasters should also coordinate any such situations with their Area Political Campaign Mail Coordinator.
- If a significant amount of a Political Mailing is identified at a PARS/CIOSS site as undeliverable and assigned to waste, the site PARS Coordinator must submit an Issues Report to the District Election and Political Mail Coordinator(s). Submit the Issues Report to the assigned coordinators with a digitized copy of the individual mailing attached and include a brief description of the issues and approximate volumes. Each processing facility will determine the parameters defining significant amounts based on their average daily mail volumes and waste levels.

Political Mail Log

PROCESSING & DISTRIBUTION ELECTION AND POLITICAL MAILING LOG

PLANT NAME &
LOCATION: _____

Name of Political Group (sender) Permit #	No Pieces	Date/Time Received	Description of Mailing - Class Letters - Flats	Election Date (if shown)	Disposition of Mailing	Accepting Employee Initials	Problem Contact/Name Title, Date & Time	Date/Time Mail Released

- All Political Mail and Election Mail must be logged through entire mail stream
- Compare logs between functions to ensure all entered mail is processed and delivered. The Operations Supervisor, or their designee, must sign the BMEU Political Mail Log when responsibility for mail is transferred.
- Clearance must be communicated with Election and Political Mail Coordinators and Teams
- Forward completed Logs to plant management & Election and Political Mail Team
- The Processing & Distribution Election and Political Mailing Log and many other Election and Political Mail materials are available at <http://blue.usps.gov/marketing/election.htm>.

Any delay in processing political campaign or message mailings must be documented.

Late Deposit

- Inform mailers attempting to deposit political campaign and message mailings that may be too late for delivery by the election date under Postal Service delivery objectives of the potential for late delivery. Document and maintain this advice.

Report of Delays

- Give immediate attention to any reported delay in processing or delivering political campaign and message mailings and fully document inquiries made and subsequent action taken.

Processing and Delivery Records

Managers, Business Mail Entry, and postmasters must keep documented records of all political campaign and message mailings that are deposited or received at their offices, with particular attention to those deposited or received too late for timely delivery.

At a minimum, these documented records must include the following:

- The name of the mailer.
- A sample, photocopy, or description of the mailing.
- The date and time the mailing was received for dispatch or delivery.
- The Election Day deadline and, if applicable, the date of requested delivery.
- If applicable, the approximate number of pieces not delivered before the Election Day deadline and/or the date of requested delivery and the reasons why delivery was not timely.
- The approximate volume of any Standard Mail consigned to waste upon instruction by the mailer.